



S P I R E L A W

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Via Electronic Filing

The Honorable Peggy Kuo
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
New York, NY 11201

July 11, 2022

Re.: Nelson v. Pratt Pizza Inc. et al (1:22-cv-03029)

Your Honor:

This law firm represents Defendant, Pratt Pizza Inc. in the above-referenced matter. The current deadline to respond to the Complaint is July 12, 2022. The undersigned counsel, files this letter motion on behalf of defendant Pratt Pizza, Inc., ("Pratt Pizza") on consent respectfully requesting a second extension of time for Pratt Pizza to answer, move, or otherwise respond to the complaint, up to and including July 29, 2022, which would mirror the deadline for codefendant John Takos to file his Answer. Pratt Pizza requests the extension of time to respond to the complaint as Defendants and Plaintiff are currently working on potential settlement negotiations. Pratt Pizza waives any defenses with respect to service of the summons and complaint.

This is Pratt Pizza's second request for an extension of time to respond to the Complaint. The extension of time will not affect any other scheduled dates.

Plaintiff does not oppose an extension of Pratt Pizza's time to respond to the Complaint so that the parties may continue to devote their energies to potentially resolving this matter. We thank the Court for its attention to this matter.

Respectfully,

Ian E. Smith, Esq.
Senior Counsel, Spire Law, LLC

cc: VIA ECF: All Counsel